

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA                  )  
    )  
    )  
v.    )         CRIMINAL NO. 13-10200-GAO  
    )  
    )  
DZHOKHAR TSARNAEV                      )

**FILED UNDER SEAL**

**ASSENTED-TO MOTION FOR LEAVE TO FILE REPLY TO  
GOVERNMENT'S OPPOSITION TO MOTION FOR ORDER TO  
MAINTAIN PROTECTION OF PRIVILEGED AND  
CONFIDENTIAL DEFENSE INFORMATION AND WORK PRODUCT**

Defendant, Dzhokhar Tsarnaev, by and through counsel, respectfully requests leave to file a reply, by October 30, to the government's Opposition to his Motion for an Order to Maintain Protection of Privileged and Confidential Defense Information and Work Product, Judgment Notwithstanding Verdict and for New Trial. Assistant U.S. Attorney William Weinreb has assented to this motion and to the proposed deadline.

As grounds for this motion, the defense states that the Opposition includes arguments that warrant responses, including but not limited to its claim that this Court lacks the authority to prevent the government from reneging on its agreement and obtaining privileged and confidential information about the defense.

Respectfully submitted,

DZHOKHAR TSARNAEV  
by his attorneys



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**Certificate of Service**

I hereby certify that this document has been served by email PDF on counsel for the United States on October 20, 2015.



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Miriam Conrad